

Marcus Leinart  
State Bar No. 00794156  
Leinart Law Firm  
10670 N. Central Exprwy, Ste 320  
Dallas, TX 75231  
469.232.3328 Phone  
214.221.1755 Fax  
ATTORNEY FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**IN RE:**

**Andre Williams**

**Tammy Renee Williams  
Debtors**

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§

**CASE No. 20-40200-elm-7**

**CHAPTER 13**

**MOTION TO VACATE DISCHARGE ORDER AND REINSTATE CHAPTER 7 CASE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW BEFORE THE COURT, Andre Williams Tammy Renee Williams, Debtors in the above-numbered and styled cause, and files this their Motion to Vacate Discharge Order and Reinstate Chapter 7 Case, and would respectfully show the Court as follows:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105 and 28 U.S.C. §1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b)
2. Debtors filed for Bankruptcy protection under Chapter 7 of Title 11, United States Code on 1/15/2020.
3. Debtors' case was discharged on 6/26/2020.
4. Debtors wish to file reaffirmation agreements with their creditors. Debtor did not receive reaffirmation agreements from their mortgage and car creditor. At the time the reaffirmation agreements were requested, Debtor was behind 2 weeks on his home so the mortgage company did not send a reaffirmation agreement. He caught up the house right after that. Debtor believes that the reaffirmation agreement for the vehicle was lost

in the mail. Debtor's attorney had moved locations and it is possible that it was not forwarded to the correct address and was returned to the creditor. Debtor is in the process of refinancing his home and not having the debts reaffirmed is causing issues in the getting his home refinanced. .

5. Debtors respectfully request this Court grant this request to Vacate Discharge Order and to reinstate their Chapter 7 case to this Court's active docket.

WHEREFORE, PREMISES CONSIDERED, Debtors Andre Williams Tammy Renee Williams pray the Court order their Chapter 7 Discharge be Vacated and the case be reinstated to this Court's active docket, and for such other and further relief as the Court deems just.

DATED: August 14, 2020

Respectfully Submitted,

Leinart Law Firm  
10670 N. Central Exprwy, Ste 320  
Dallas, TX 75231  
469.232.3328 Phone  
214.221.1755 Fax

By: /s/ Marcus Leinart  
Marcus Leinart  
State Bar No. 00794156  
ATTORNEY FOR DEBTORS

### **CERTIFICATE OF SERVICE**

I hereby certify that on August 14, 2020, I did serve a true and correct copy of the foregoing to the following interested parties, and to those parties listed on the matrix as filed with the Court, by United States Mail, First Class:

Andre Williams Tammy Renee Williams  
8500 Pinwood Drive  
Fort Worth, TX 76123

Office of the Standing Chapter 7 Trustee  
3000 Central Drive  
Bedford, TX 76021

United States Trustee  
1100 Commerce, Rm 976  
Dallas, TX 75242

/s/ Marcus Leinart  
Marcus Leinart  
Attorney for Debtors